

The Honorable S. Kate Vaughan

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

SAMUEL ARCHIE MATTA

Defendant.

No. MJ22-302
COMPLAINT for VIOLATION
26 U.S.C. §§ 5861(d), 5845(a)(8)

BEFORE the Honorable S. Kate Vaughan, United States Magistrate Judge, United States District Courthouse, Seattle, Washington.

The undersigned complainant being duly sworn states:

COUNT 1
(Possession of Destructive Devices)

On or about April 29, 2022, in Snohomish County, within the Western District of Washington, SAMUEL ARCHIE MATTA knowingly possessed destructive devices, that is:

Two plastic bottles filled with an explosive powder and wrapped with metal nuts, bolts, washers, and screws;

Four cylindrical shaped consumer fireworks that had been altered by attaching black metal spikes around the exterior of the firework body;

1 Two spherical shaped consumer fireworks that had been altered by attaching gold
2 metal spikes around the exterior of the firework body; and

3 One cylindrical shaped consumer firework with a spherical end that had been
4 altered by attaching silver metal spikes around the exterior of the firework body;
5 all of which were not registered to him in the National Firearms Registration and Transfer
6 Record.

7 All in violation of Title 26, United States Code, Sections 5861(d) and 5845(a)(8).

8 The undersigned complainant, Abel Peterson, Special Agent, being first duly
9 sworn on oath, hereby further deposes and states:

10 **TRAINING AND EXPERIENCE**

11 1. I have been employed as a Special Agent of the Federal Bureau of
12 Investigation (FBI) since November 2014 and am currently assigned to the Seattle Field
13 Office. My primary duties as a Special Agent include investigations of major crimes
14 occurring in Indian Country, including, but not limited to, arson, assaults, crimes against
15 children, domestic violence, firearms, fraud, kidnappings, murders, narcotics, rapes, and
16 robberies. I am an investigative or law enforcement officer of the United States within
17 the meaning of Section 2510(7) of Title 18, United States Code, in that I am empowered
18 by law to conduct investigations and make arrests for federal felony offenses.

19 2. The facts set forth in this Affidavit are based on my own personal
20 knowledge, information obtained from other individuals during my participation in this
21 investigation, including other law enforcement officers, review of documents and records
22 related to this investigation, communications with others who have personal knowledge
23 of the events and circumstances described herein, and information gained through my
24 training and experience. Because this Affidavit is being submitted for the limited
25 purpose of securing an arrest warrant and obtaining a Complaint, I have not included
26 each and every fact known to me concerning this investigation. I have set forth only
27 those facts I believe are necessary to establish probable cause to believe that SAMUEL

28 ARCHIE MATTA (MATTA) has committed the crimes of Receipt or Possession of

1 Destructive Devices, in violation of Title 26, United States Code, Sections 5861(d),
2 5845(a)(8).

3 SUMMARY OF PROBABLE CAUSE

4 April 29, 2022 Assault Arrest

5 3. I have reviewed reports provided to me by the Tulalip Police Department.
6 According to those reports, on April 29, 2022, Tulalip Police Department officers
7 responded to an address on the Tulalip Reservation for a report of an assault with a
8 weapon. Parties on scene reported that MATTA had physically assaulted them and fired a
9 “BB” gun at them which struck at least one of the victims. A physical altercation ensued
10 between the witness/victim and MATTA, resulting in each striking the other. Tulalip
11 Police Department (TPD) placed MATTA under arrest for assault.

12 4. On May 4, 2022, pursuant to a tribal court order TPD personnel went to
13 MATTA’s residence, which is located within the exterior boundaries of the Tulalip
14 Indian Reservation, to secure any weapons.¹ TPD officers documented the uninhabitable
15 condition of MATTA’s residence as well as items seized pursuant to a tribal court order.
16 The residence was littered with debris, animal feces, and merchandise boxes. MATTA’s
17 bedroom was particularly unfit for habitation with piles of used toilet and tissue paper
18 waist high near a desktop computer. TPD officers collected multiple pellet and BB guns,
19 knives, bows and arrows, rifle ammunition, throwing stars, num-chuks, several swords,
20 many larger fixed blade knives, a cross bow, a spear, a scythe, and a long-handled
21 Lucerne Hammer weapon.

22 5. At the time TPD was at MATTA’s home tasked with seizing weapons.
23 TPD observed a lot of large explosive style fireworks, some of which MATTA had
24 packed into backpacks with lighters and launch tubes ready for deployment.

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¹ Matta shared the residence with his mother.
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May 15, 2022, Discovery of Destructive Devices

6. On May 15, 2022, TPD was called back to MATTA's residence concerning a report of "suspicious circumstances." On arrival, TPD was met by MATTA's brother (hereafter BROTHER), who reported having arrived at MATTA's residence to help clean up as it was actually their mother's home. BROTHER reported only MATTA and their mother reside in the home and that BROTHER is estranged from MATTA as of the past several years.

7. While conducting clean up at the residence, BROTHER found suspicious chemicals and "shrapnel bombs." BROTHER showed TPD officers several containers of chemicals and photos BROTHER took of what appeared to be Improvised Explosive Devices (IEDs). For safety reasons, TPD secured the residence and requested assistance from the Washington State Patrol Bomb Squad. FBI Special Agent Bomb Technicians and a Snohomish County Sheriff's Office deputy also responded.

8. TPD obtained and executed a tribal search warrant for the residence with the assistance of Washington State Patrol, ATF, and FBI personnel. Additionally, MATTA's mother had also provided verbal consent to enter the residence. Bomb technicians rendered safe the "shrapnel bombs," (Devices), reported by BROTHER and prepared them for collection as evidence by TPD personnel. The Devices appeared to be a type of plastic bottle filled with an explosive powder and wrapped with metal nuts, bolts, washers, and screws as depicted in Figure 1 below.

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Figure 1

9. During the search, law enforcement located multiple containers of chemicals (suspected precursor chemicals for the making of explosive devices) and a large quantity of consumer fireworks, which nearly filled the back of a pick-up truck used by TPD. A black bag located in MATTA's bedroom was found to contain several consumer fireworks that had been altered by attaching metal spikes around the exterior of the firework body as depicted below in Figures 2 and 3. A consumer firework that had been altered by attaching silver metal spikes around the exterior of the firework body was also recovered and is depicted below in Figure 4. Bomb technicians rendered the devices safe for travel and storage.

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Figure 2



Figure 3

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Figure 4

Interview of Samuel Matta

10. On May 15, 2022, I, along with TPD and ATF personnel, interviewed MATTA at the Snohomish County Jail where he was being held on assault charges. MATTA was provided with his Miranda warnings and constitutional rights and, upon acknowledgment of those warnings and rights, agreed to speak with investigators. MATTA reported that he had been a science major in college and liked to try to build “things” at home. MATTA reported having ordered a do-it-yourself electronics kit for that purpose. Approximately five years earlier, MATTA reported having made some crude devices by dumping fireworks into a bottle. MATTA explained that he had done a good job making these devices, but that he did not want the devices any longer and had put them away for safe keeping. MATTA claimed these devices were the only things “like that” that he had made.

11. MATTA described the device(s) that he had built as a “crude bomb.” MATTA was not sure if the devices would actually work well, and explained that at times these devices did not really do much and would just make a bunch of “color.” MATTA admitted conducting experiments around the house and reported he could

1 probably do better if he wanted to. MATTA stated that it was pretty scary how easy it
2 was to make an explosion, but that he is currently not making any bombs.

3 12. MATTA described storing the larger devices that he had built in a “Native
4 American” style suitcase. MATTA reported placing screws and “stuff” inside the bottle
5 to help him survive a “group” attack, which he described as really a last resort “type of
6 thing.” MATTA explained that on occasions he wrapped the devices in cardboard to
7 increase the pressure and that he attached “nuts” with tape.

8 13. MATTA was shown a picture of one of the devices recovered from his
9 residence as depicted in Figure 5 below. MATTA remembered the device in the picture
10 and stated that he had built that device and that it was one of the devices he had wrapped
11 in cardboard. MATTA explained having poured fireworks into the bottle, wrapped it in
12 cardboard, threw in screws, and taped it up. MATTA stated that he had learned the
13 cardboard trick from “Boom City.” It made the fireworks more powerful and gave them
14 more “boom.” MATTA said he put it away and hoped he would never have to use it.
15 MATTA admitted that he had not registered any of his devices with the government.
16 MATTA further stated that he did not know that that could be done.

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Figure 5

14. MATTA described having made fuses in the past and explained his fuses were often better than some that come with fireworks when purchased. MATTA reported that he often used yarn or paper to make fuses because natural fibers were best because plastic would often melt.

15. When asked about the black bag that contained fireworks with metal spikes attached to them as depicted in Figures 2 and 3, MATTA recalled the devices and reported they had a pretty good “kick” to them. MATTA explained he made those devices specifically for when the “riots” were happening and added that he was afraid that the riots may make it up his street and had made those devices in order to be prepared. MATTA explained that the devices were dangerous and that he had planned to take them apart. MATTA claimed those devices had really just been for emergency purposes.

16. MATTA described that he had attached the metal spikes with hot glue and had come up with the idea on his own. MATTA ordered the spikes on Amazon and initially planned to attach them to clothing to look “cool,” but when the riots happened

1 MATTA decided he needed a way to defend himself and therefore had built the devices
2 depicted in Figures 2 and 3. MATTA reported being sure that his devices could cause a
3 lot of damage and disperse a crowd and apologized for the devices being at his house.

4 **Destructive Devices**

5 17. On May 24, 2022, a ATF Special Agent Greg Heller confirmed that
6 MATTA had not registered any destructive devices as required under the National
7 Firearms Act.

8 18. The above-described devices were transferred to FBI custody and
9 subsequently shipped to the FBI Laboratory for further analysis and testing. A FBI
10 Explosives Examiner was provided with information, descriptions, and photos of the
11 devices described in Count 1. Upon review of that information, the Explosives Examiner
12 provided a preliminary opinion, that, present were the disassembled remains of nine (9)
13 improvised explosive devices (IED), also commonly known as homemade bombs. The
14 general components of an IED are an explosive main charge, a fusing system, and
15 sometimes a main charge container and/or concealment container. Present amongst each
16 of the devices described in Count 1 are a potentially energetic material, a main charge
17 container, and a non-electric fusing system.

18 19. The FBI Explosives Examiner stated that two elements that must be met to
19 make an affirmative destructive device determination are that the device or device
20 components constitute an explosive device or incendiary device and that the devices or
21 device components possess the functional characteristics and/or design elements of a
22 weapon. The Explosives Examiner offered the opinion that, based on the preliminary
23 review of the above described information, the devices described in Count 1 would be
24 considered destructive devices. The use of energetic materials, a main charge container,
25 and the addition of metal fragmentation show weapon characteristics in the design of the
26 devices.

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CONCLUSION

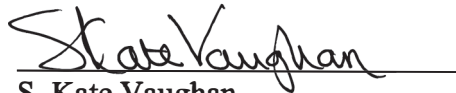
20. Based on the aforementioned facts, there is probable cause to believe that SAMUEL ARCHIE MATTA committed the crime of Possession of Destructive Devices, in violation of Title 26, United States Code, Sections 5861(d) and 5845(a)(8).



Abel Peterson, Special Agent
Federal Bureau of Investigation

On this date, the above-named agent provided a sworn statement attesting to the truth of the contents of the foregoing Affidavit, and based on the sworn Complaint and Affidavit, the Court hereby finds that there is probable cause to believe the defendant SAMUEL ARCHIE MATTA committed the offense set forth in the Complaint.

DATED this 14th day of July.



S. Kate Vaughan
United States Magistrate Judge